



Powerlink Queensland

Modern Slavery Statement

2021/2022

November 2022

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MESSAGE FROM THE BOARD

Modern slavery is a crime and a violation of fundamental human rights. Powerlink is committed to working to eliminate modern slavery. Our business dealings and relationships are founded on acting ethically and with integrity. Effective systems and controls are in place at Powerlink to reduce the risk of modern slavery in our business arrangements.

We are working collaboratively with our suppliers to identify, assess and address the risks of modern slavery within our supply chain. This approach is supported by continued engagement with the Energy Procurement and Supply Association's modern slavery sub-committee, to share knowledge and improve our effectiveness.

This Statement outlines our actions to assess the risk of modern slavery in our operations and supply chain, as well as our continued efforts to raise the awareness of modern slavery.

All Board members have reviewed and formally endorsed this Statement and verify it to be true and correct. As per the requirement of the Act, a Director on the Board has approved the submission of this Statement for the period 1 July 2021 to 30 June 2022.



Kathy Hirschfeld AM
Chair



INTRODUCTION

This Modern Slavery Statement has been developed and submitted by Powerlink Queensland, in accordance with the requirements of the Commonwealth Modern Slavery Act 2018.

This Statement describes the actions taken by Powerlink and its consolidated subsidiary entities to address the risks associated with modern slavery and human trafficking within Powerlink's operations and supply chains for the financial year ending 30 June 2022.

We are a Government Owned Corporation (GOC) that owns, develops, operates and maintains the high voltage electricity transmission network in Queensland.

Powerlink procures goods and services required to meet the needs of the end-to-end high voltage transmission lifecycle. This includes high voltage equipment, construction works, plant maintenance, plant spares, labour hire, IT equipment/consumables, and professional services.

Across businesses and industries as a whole, supply chains that have been identified via global modern slavery indexes as containing or being high risk are:

- Personal protective clothing
- Fabrication and textiles
- Technology equipment manufacturing
- Maintenance services and/or labour/contingent workforce contracts.

Powerlink's Modern Slavery Statement:

1. Identifies Powerlink as the reporting entity
2. Describes Powerlink's structure, operations and supply chains;
3. Describes the risks of modern slavery practices in Powerlink's operations and supply chains and any entities which Powerlink owns or controls
4. Describes the actions taken by Powerlink and any entities that it owns or controls to assess and address these risks, including due diligence and remediation processes
5. Describes how Powerlink assesses the effectiveness of these actions
6. Describes the process of consultation with any entities Powerlink owns or controls
7. Discusses other information, which Powerlink considers relevant.

The term 'modern slavery' is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom or exposes them to serious exploitation. It does not include practices like sub-standard working conditions or underpayment of workers. However, these practices are also illegal and harmful, and are considered under the Ethical Supplier Mandate and Ethical Supplier Threshold activities, managed within Powerlink's supply chain processes in line with the Queensland Government Procurement Policy 2021.

Apart from the obvious harmful human impact on those directly affected by modern slavery, it can also affect Powerlink in other ways. It distorts global markets and undercuts responsible business. If not addressed, modern slavery in operations and supply chains can pose serious reputational and legal risks, and damage commercial relationships.

ABOUT POWERLINK

Reporting Entities

This Modern Slavery Statement (**Statement**) has been developed by Queensland Electricity Transmission Corporation Limited, ABN 82 078 849 233, trading as Powerlink Queensland (**Powerlink**). This Statement demonstrates the actions taken to assess and address modern slavery risks within Powerlink’s operations and supply chains for the reporting period July 2021 to June 2022, as defined in the Commonwealth *Modern Slavery Act 2018* (**the Act**). As the majority shareholder of Queensland Capacity Network Pty Ltd, ABN 75 633 081 517, trading as QCN Fibre (**QCN**), this Statement produced by Powerlink includes the activities of the subsidiary QCN. QCN has been engaged during the process of implementing the Modern Slavery Strategy and has contributed data included in this Statement.

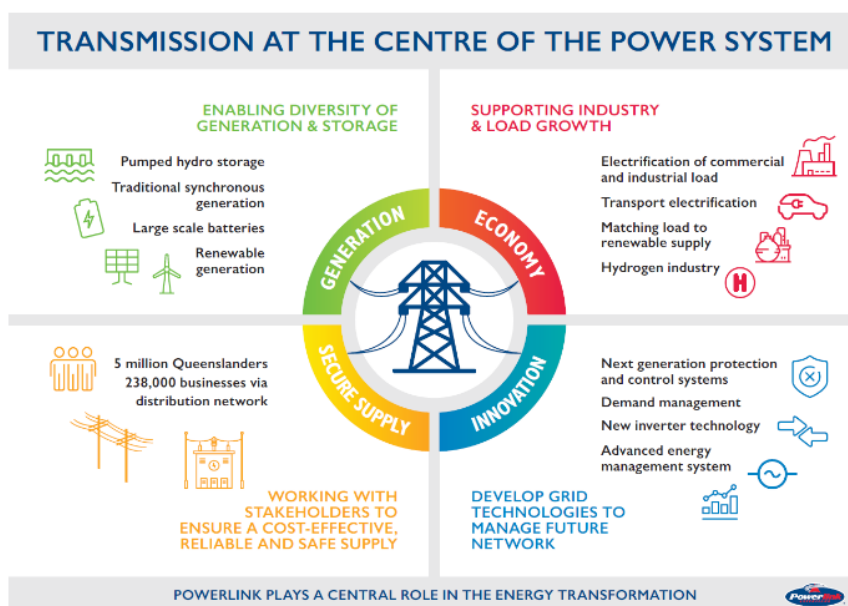
The Role of Powerlink

Powerlink is a leading Australian provider of high voltage electricity transmission network services, providing electricity to five million Queenslanders and 238,000 businesses.

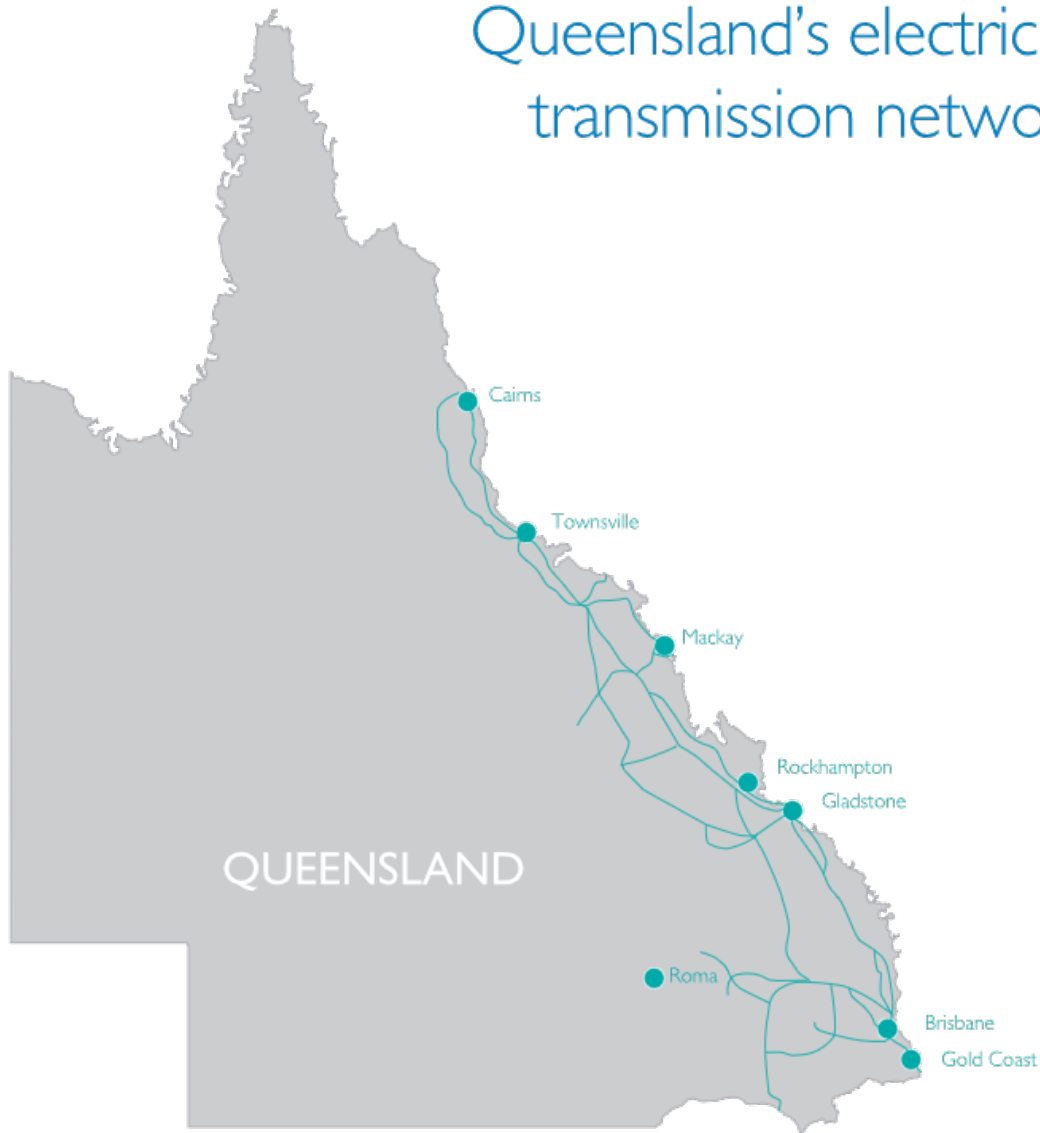
Powerlink is a Queensland Government Owned Corporation (**GOC**) which owns, operates and maintains the transmission network that extends 1,700km from north of Cairns to the New South Wales border, and comprises 15,345 circuit kilometres of transmission lines and 147 substations.

Powerlink’s role in the electricity supply chain is to transport high voltage electricity from large generators through our transmission grid to the distribution networks owned by Energex and Ergon Energy (part of the Energy Queensland Group) and Essential Energy (in northern New South Wales) to supply customers.

We also transport electricity to large industrial customers such as rail companies, mines and mineral processing facilities, and to New South Wales via the Queensland/NSW Inter-connector transmission line.



Queensland's electricity transmission network



The Role of QCN Fibre

QCN Fibre is a telecommunications company, jointly owned by Powerlink and Energy Queensland. Powerlink is the majority shareholder of QCN Fibre. Its mission is to improve telecommunications connectivity across the whole of Queensland, through leveraging spare capacity on the government-owned fibre network and access to infrastructure to host telecommunications equipment.

QCN Fibre is a carrier-agnostic wholesale telecommunication carrier providing backhaul and co-location access to over 20,000 towers. QCN Fibre utilises over 13,000 kilometres of optical fibre network stretching west from Brisbane to Toowoomba and beyond, and north through regional townships to Cairns, supplying high-capacity wholesale backhaul services to telecommunication service providers who use large volumes of voice, data and video traffic.

STRUCTURE

Powerlink’s structure has been designed to meet the service delivery needs of our customers. The Powerlink Board and Executive Team establish the overall corporate governance of Powerlink, as well as the strategic direction, policies and operational framework. The Board and management work together to establish and maintain a legal and ethical environment and framework that ensures accountability throughout Powerlink that is in the best interests of shareholders and the corporation.

Powerlink is structured into six distinct business divisions assigned with the responsibility of providing end-to-end delivery of Powerlink’s services, including:

- Transmitting electricity from generators to distributors/customers
- Network operations, asset management, and asset maintenance
- Installing and maintaining new network infrastructure.

Powerlink Board

Responsible for the overall corporate governance of the corporation and its subsidiary companies, setting the organisation’s strategic direction, setting goals for management, and establishing the policies and operational framework for the corporation.

Chief Executive

The Board and management work together to establish and maintain a legal and ethical environment and framework that ensures accountability throughout Powerlink, which is in the best interests of shareholders and the corporation.

Network Business Development

Bringing together Powerlink’s Strategy and Network Portfolio Groups, which both focus on strategy development, providing an overall integrated strategy for the future.

Energy Futures

Responsible for developing the integrated Electricity Pathways work to inform and guide Queensland policy development around future energy policy and help transform Queensland electricity transmission system.

Operations & Service Delivery

Delivering Powerlink’s state-wide operations, field maintenance, telecommunication services, operational technology, laboratory and warehousing services.

Delivery & Technical Solutions

Will safely plan and deliver infrastructure and provide technical solutions to enable cost effective and reliable electricity transmission services.

Finance & Governance

Ensuring Powerlink builds a strong focus on finance, cost management, risk and governance, while maintaining management of Board and GOC matters.

People & Corporate Services

Includes Business IT, People and Culture (P&C), Health, Safety and Environment (HSE), as well as Communications, Customer and Engagement.

OPERATIONS

Modern Slavery Policy

Powerlink has a Modern Slavery Policy (**the Policy**) committing to identifying and eliminating the risk of modern slavery, which applies to all employees, suppliers and contractors engaged by Powerlink.

The Policy defines the prevention, detection and reporting of modern slavery in any part of Powerlink's operations or supply chains as the responsibility of all those working for, or engaged by Powerlink.

Where appropriate, and with the welfare and safety of workers as a priority, Powerlink gives support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own operations and supply chains.

If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains contravenes this Policy, staff are encouraged to raise it with their manager. Alternatively, they may choose to access the Whistle-blower hotline with any concerns.

Internal Operations

Powerlink is a GOC with approximately 1074 workers, 931 of which are permanent employees based in Brisbane. The remaining 143 workers are contractors and/or labour hire engaged in non-permanent roles.

Powerlink has a strong industrial relations presence within the business and relevant unions are engaged regularly as part of applicable sourcing activities. There have been no identified issues with suppliers, trade unions, or other bodies representing workers, in relation to modern slavery risks in the execution of activities across the Powerlink supply chains.

Powerlink has a clearly understood and articulated Industrial Relations Strategy, consistently applied by our leaders that focuses on:

- Relationship management
- Constructive workplace culture
- A safe, engaged, skilled workforce.

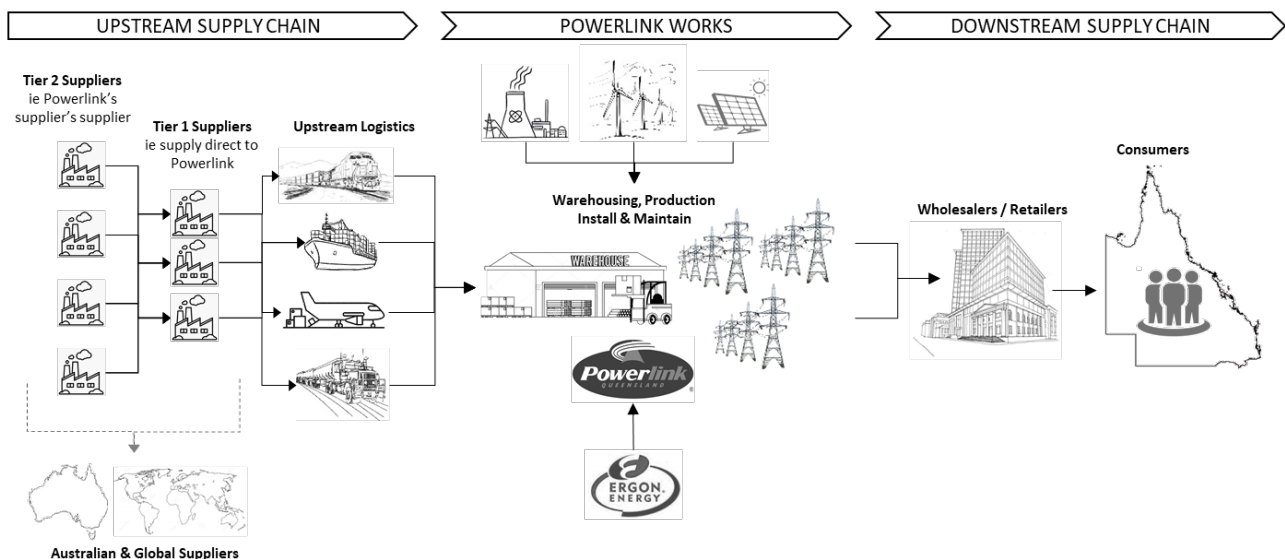
SUPPLY CHAINS

The supply chain for Powerlink is not complex. Powerlink’s business activities across Queensland are delivered directly by Powerlink without the use of agencies, distributors or franchising.

The upstream portion of the supply chain includes Powerlink’s suppliers and the processes for managing those relationships.

The Powerlink works portion consists of the operational activities required to transmit electricity from power generators to customers.

The downstream portion consists of the electricity retailers managing the direct linkage to end-use customers.



Powerlink’s business activities involve the procurement of goods and services. The sourcing of goods and services are managed through robust procurement activities conducted in alignment with the [Queensland Government Procurement Policy 2021](#).

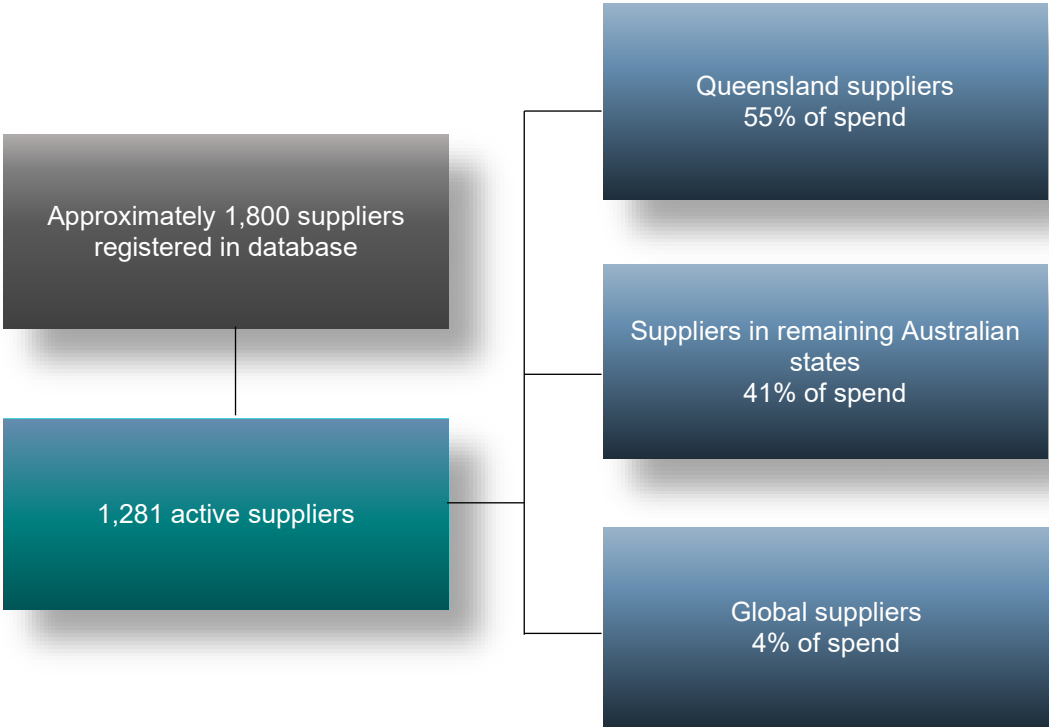
The types of goods and services sourced by Powerlink include:

- IT Services, Software and Hardware
- Transport and Storage
- Vehicles
- Clothing & Personal Protective Equipment
- Telecommunications Equipment
- Business services, professional services
- Travel and catering
- Protection & Control Equipment
- Overhead Lines Equipment
- Substation Materials
- High Voltage Equipment
- Cables and Accessories
- Building, Civil and Construction Services
- Repairs - Primary Plant & Secondary Systems
- Energy, Lubricants & Gases
- Tools & Specialist Equipment

Approximately 96 per cent of Powerlink’s total addressable spend of all goods and services are sourced within Australia, however goods may have some or all components manufactured globally. The remaining 4 per cent of goods and services are sourced from overseas countries including:

- Austria
- Brazil
- Canada
- China
- France
- Germany
- Great Britain
- India
- Ireland
- Netherlands
- New Zealand
- Switzerland
- United States of America

Powerlink’s Supplier Base Profile



OUR APPROACH

Powerlink's risk of modern slavery is considered in two parts – the risks in our internal operations and the risks in our supply chains.

Powerlink's Internal Operations

The risk of modern slavery in Powerlink's internal operations is managed by the People and Culture team through the implementation of various policies and procedures reflecting legislative and regulatory requirements.

Powerlink ensures that all employees are afforded working conditions meeting or exceeding legislative requirements through Queensland Government approved, three-year Enterprise Agreements. The Enterprise Agreements in place at Powerlink are the Working at Powerlink Union Collective Agreement 2020 (WAPA) and the Powerlink Managers Agreement 2021.

Powerlink does engage contractors and labour hire workers when necessary, however, the risk of modern slavery practices is mitigated through the use of compliant suppliers engaged under a supplier panel, with strict industrial relations terms and conditions applied.

Powerlink has a number of policies and procedures including an [Employee Code of Conduct](#), Employee Complaints Procedure and Complaints Management Framework (including external integrity / whistleblowing hotline) designed to protect the rights of staff in line with legislation.

The risk of instances of modern slavery in Powerlink's internal operations is considered very low.

Modern Slavery Awareness Training

Modern Slavery is a complex issue. Powerlink has recognised the need to provide dedicated training to increase the awareness of the potential for modern slavery in our supply chains and provide guidance for staff in the event that they identify a potential instance of modern slavery.

In the financial year 2021/22 an online training module has been developed and deployed to all staff that are directly or indirectly involved in procurement activities. This includes staff:

- who engage an external business on behalf of Powerlink to provide goods (tangible items) or services (tasks performed for the benefit of Powerlink)
- doing business on behalf of Powerlink that comes into contact with current or potential suppliers
- who commit to, or expend money on behalf of Powerlink through the use of credit cards, purchase requisitions, purchase orders, or contracts
- dealing with or managing a supplier on behalf of Powerlink including:
 - Seeking quotes or tenders
 - Overseeing delivery of supplier deliverables
 - Liaising with suppliers on operational, technical or commercial activities
 - Contract management activities.
- in a role within Powerlink that has authority to make purchasing decisions through either endorsement or approval of procurement activities conducted within their business area.

The key themes of the training package include:

- Introduction – why we need to identify and assess modern slavery risks in procurement;
- Understanding modern slavery – a detailed overview of:
 - What is modern slavery
 - The scale of exploitation
 - Signs of modern slavery
 - Modern slavery in procurement
- Compliance with modern slavery legislation
- Understanding the risks
- Further information and resources – Powerlink’s Policy, processes and contacts.

Modern Slavery Working Group

The implications of the Act touch on many areas of Powerlink’s business. It is important that all relevant areas of the business understand the Act and share responsibility and accountability for meeting Powerlink’s obligations. The broader business will be informed and involved in the ongoing vigilance and monitoring of the Act requirements in all dealings with Powerlink’s suppliers. Action Plans put in place with high risk/non-conforming suppliers will be monitored and checked by Powerlink’s contract managers.

To facilitate this business-wide approach, a Modern Slavery Working Group consisting of representatives from relevant areas of the business meet regularly to facilitate the integration of the requirements of the Act into Powerlink’s operations and supply chains.

The Working Group is responsible and accountable for:

- Communication to raise awareness of the Modern Slavery Act (MSA), including lead the communication of modern slavery related information to / from and within their respective divisions
- Contribute to the analysis of Powerlink’s suppliers to determine risk profiles for each supplier;
- Support, consult, and influence suppliers within their business areas to participate / respond to:
 - MSA tender schedules
 - MSA survey requests
 - Action Plan development
- Contributing to the development of Powerlink’s annual Modern Slavery Statement
- Leading the discussions with identified high risk / non-conforming suppliers engaged by their divisions and working with contract managers and those suppliers to develop Action Plans where required
- Maintaining Powerlink’s Modern Slavery Act – Standard
- Reviewing and updating Divisional documentation to reflect Powerlink’s Modern Slavery Act – Standard and the requirements of the Act
- Developing initiatives aimed at reducing the risk of modern slavery in Powerlink’s operations and supply chains
- Responding to customer enquiries relating to Powerlink’s assessment and actions regarding modern slavery in our operations and supply chains.

Powerlink's Supply Chains

Powerlink has measures in place to identify and reduce the risk of modern slavery in its supply chains. Powerlink's [Supplier Code of Conduct](#) is available on the Powerlink website and contains expectations of suppliers to act against human rights abuses in the supply chains and commit to high ethical standards. One avenue for complaints relating to breaches of the Supplier Code of Conduct is the Whistle-blower process. The Supplier Code of Conduct applies to all suppliers engaged to provide goods or services to Powerlink.

Tender packages released to market contain a detailed description of Powerlink's position regarding the intent to comply with the Act and other Government policies or mandates, including the Ethical Supplier Mandate listed within the Queensland Government Procurement Policy 2021 (QPP). Powerlink's tender packages detail the expectation of Powerlink's supply chains to be equally compliant. A tender schedule requires all tenderers to provide relevant information regarding their business practices and how these support meeting Powerlink's Supplier Code of Conduct including Modern Slavery requirements.

External Factors Impacting Powerlink's Supply Chains

There has been significant disruption of supply chains globally over the last year. Powerlink has been reviewing these disruptions, assessing the impacts on Powerlink's operations, and putting in place measures to mitigate these impacts. The factors affecting Powerlink's supply chains include:

- An increase of approximately 15-20 per cent in the cost of ocean freight
- A drop from approximately 75 per cent to 36 per cent in the reliability of ocean freight delivery times
- Global uptake of Electric Vehicles has led to supply shortages, affecting suppliers' ability to source the raw materials and components required for high voltage electrical equipment, telecommunications, protection and control equipment
- Volatility in prices of commodities such as steel, copper, aluminium and other minerals
- Geopolitical tensions (Russia-Ukraine conflict) arising to suppliers and sub suppliers having to seek alternative supply chains.

The global renewable energy boom resulting in increased demand of materials globally hence increased competition as supply struggles to keep up. The increased demand and prices for components and raw materials increases the potential for an increase in modern slavery risks in our suppliers' (particularly overseas suppliers) supply chains. Additionally, when viewed in relation to global demands, Powerlink's requirements are only a small portion of our suppliers' business, which limits our ability to influence driving supplier policies and behaviours with respect to assessing and addressing the risks of modern slavery in their operations and supply chains.

The impacts of these external factors on Powerlink's supply chains include:

- Increased prices for equipment and materials.
- Increased lead times for equipment and materials.
- Increased risk of quality issues with equipment and materials.
- Reluctance of suppliers to commit to long-term pricing arrangements.
- Suppliers seeking reviews of commercial terms and pricing for existing contracts.

In order to increase our resilience and mitigate the potential for an increased risk of modern slavery in our supply chains, Powerlink has taken the approach of being flexible in engaging with our suppliers over existing arrangements, so as not to increase pricing and supply pressures on their operations and supply chains.

Supplier Risk Assessment

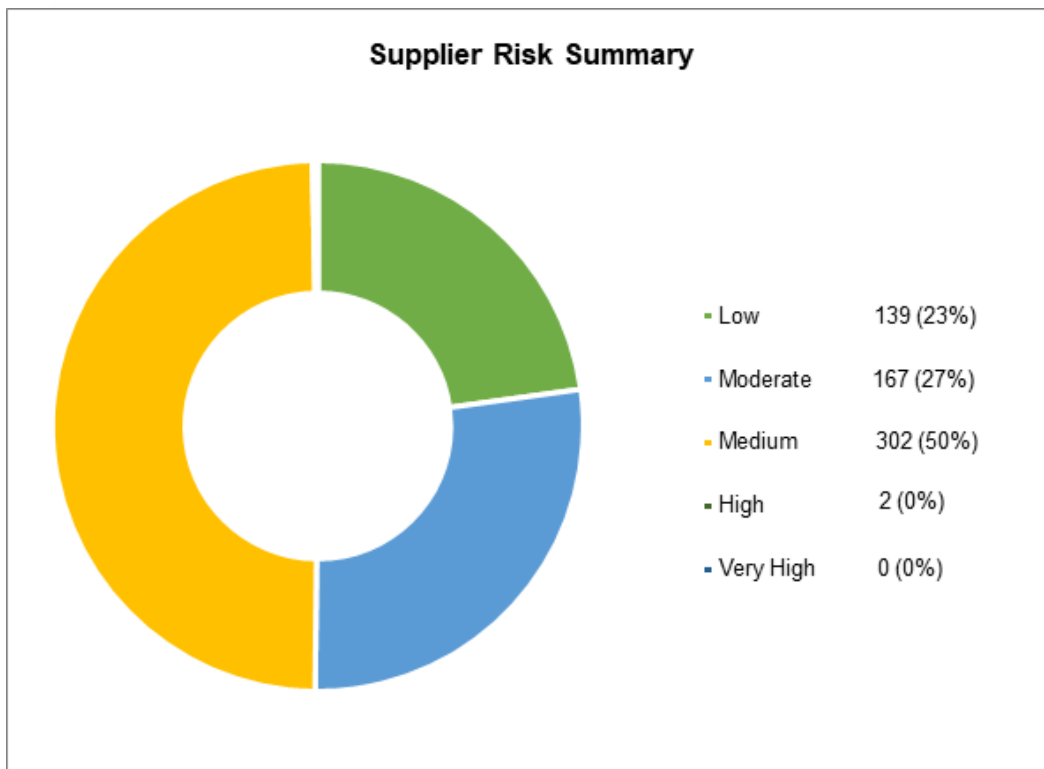
Powerlink has over 1,800 suppliers in our database of which 1,281 are active. Powerlink has information available via the internal Enterprise Resource Planning (ERP) systems regarding Powerlink’s supplier’s office locations, and has been able to extrapolate limited information on commodities and industries. However, in order to accurately identify the risks posed by each supplier, it is necessary to delve into their operations and supply chains to identify the country or region where goods are manufactured, the raw materials used and where they are sourced, and the composition of the supplier’s labour force.

Powerlink utilises a third-party web-based platform developed in conjunction with the Energy Procurement Supply Association (EPSA) Modern Slavery sub-committee to assess and report on the risk of Modern Slavery in our supplier’s operations and supply chains.

All of Powerlink’s 1,281 currently active suppliers have been invited to register on the EPSA Modern Slavery Platform and complete the Self-Assessment Questionnaire (SAQ).

The supplier responses to the SAQ are used to provide a supplier risk profile based on a number of factors including:

- Country or region of origin
- Commodity being procured
- Industry of origin for the product or service
- Procurement of raw materials
- Employment of vulnerable workforces.



Analysis of High Risk Suppliers

Powerlink's current supplier risk profile based on the 610 completed SAQs indicates only two potentially high-risk suppliers.

Powerlink has performed a review of the responses of the high-risk suppliers and discovered that the high-risk rating resulted from low levels of business processes and systems aimed at mitigating the risks of modern slavery in their operations and supply chains. Both suppliers are small family-owned businesses with less than four employees and based in Brisbane. There is no outsourcing of labour or sub-contracting to third parties.

In consideration of the workforce composition and business model of these suppliers, the risk associated with the absence of a dedicated Modern Slavery Policy, documented Modern Slavery Procedure, or Whistle-blower process is considered acceptable. No further action is deemed necessary at this time.

DUE DILIGENCE PROCESSES

Monitoring and Reporting

Powerlink has commenced internal monthly reporting to monitor and report progress in relation to the assessment of its supplier base. The EPSA Modern Slavery Platform provides downloadable data on the SAQ status and risk profiles of suppliers. Powerlink uses this data to follow up with suppliers to increase participation in completing the SAQ.

Powerlink leadership has been engaged in the implementation of our Modern Slavery activities including presenting information to Powerlink's Board on:

- An introduction to Modern Slavery
- Powerlink's approach to Modern Slavery
- Activities completed to date
- Business Involvement and the Modern Slavery Working Group
- Identification of potential risks in our operations and supply chains
- Current status of supplier engagement and risk profiling on the EPSA Modern Slavery Platform
- An assessment of the two suppliers identified as potentially having a high risk of Modern Slavery in their operations and supply chains
- Ongoing activities and reporting targets for 2022/23
- Processes for managing Modern Slavery assessment and reporting
- Processes for dealing with identified high-risk suppliers, identified instances of Modern Slavery Practices in a supplier's operations, and unco-operative suppliers.

Consultation and Engagement

Queensland Government Entities Community of Practice

Powerlink is an active member of the Modern Slavery Community of Practice (CoP) established by Queensland Rail to share knowledge, experiences and information relating to Modern Slavery. The goals of the CoP are to:

- Collaborate and promote the sharing of ideas, knowledge and information
- Gain access to expertise
- Build and develop people's knowledge and understanding of Modern Slavery
- Identify opportunities for shared resources and cost savings
- Assist in facilitating tangible business benefits and opportunities
- Reduce duplication of effort.

Membership of the CoP is open to Queensland Government Owned Corporations, Statutory Bodies and Budget Sector Agencies. The Department of Energy and Public Works participates in the CoP as a key stakeholder responsible for Queensland Government Procurement Policy development and implementation.

The CoP has been instrumental in influencing the Queensland Government's response to the Act and provided important input into the Queensland Government's Modern Slavery Framework and Roadmap.

Energy Procurement Supply Association (EPSA)

Powerlink is a member of the Energy Procurement Supply Association (EPSA) which is a not-for-profit association made up of representatives from energy industry corporations from the Asia-Pacific region.

The EPSA Modern Slavery sub-committee was formed to facilitate collaboration between EPSA member organisations and develop a standardised approach to supplier engagement on modern slavery. The EPSA Modern Slavery sub-committee has worked with a third party to develop a web-based Modern Slavery supplier risk assessment tool. The EPSA Modern Slavery Platform is based on a standardised Self-Assessment Questionnaire (SAQ) developed by the EPSA Modern Slavery sub-committee. The benefits of the EPSA Modern Slavery Platform include:

- A reduction in duplication of effort by suppliers. When an invited supplier completes the SAQ online, there is an option to make the responses available not only to the organisation that invited the supplier, but also to other EPSA member organisations
- Standardised industry approach provides suppliers with greater certainty of industry expectations for assessing and addressing modern slavery risks in their operations and supply chains
- A reduction in duplication and effort by EPSA member organisations. When a supplier elects to share their SAQ responses, it allows EPSA member organisations to gain access to risk assessments and remedial action plans for a larger number of suppliers than would have been otherwise possible
- Collaboration with other EPSA member organisations to enhance knowledge sharing and continuous improvement opportunities.

The EPSA Modern Slavery sub-committee has refined the SAQ over the course of 2021/22 and worked with the platform provider to improve the functionality and reporting capabilities of the tool.

Throughout the year the EPSA member organisations have continued to enter their suppliers and assessments into the EPSA Modern Slavery Platform and there are now over 5,567 organisations registered with more than 1,041 having completed the SAQ and been allocated a risk rating.

Effectiveness Assessment

The focus for the reporting period ending 30 June 2022 has been on increasing the number of supplier risk assessments completed via the EPSA Modern Slavery platform. Over 47 per cent of Powerlink's active suppliers have completed the supplier risk assessments. This increase has been the result of increased engagement with suppliers by Powerlink's Modern Slavery Working Group.

There have been improvements in the EPSA Modern Slavery platform reporting which has allowed for Powerlink to implement internal reporting on the progress of the supplier risk assessments and our supplier base risk profile. This information is now reported monthly through management up to the executive level, increasing the awareness of our modern slavery efforts throughout the business.

LOOKING AHEAD

Powerlink will continue to work towards completing risk assessments for all of our active suppliers. To facilitate this Powerlink will:

- Monitor and report against an internal target of 75 per cent of Australian based suppliers to have completed the supplier risk assessment by 30 June 2023
- Through the Modern Slavery Working Group, list, prioritise and work with our suppliers in each business area that have yet to complete the supplier risk assessment
- Use best endeavours to influence international suppliers to complete the supplier risk assessment.

Other steps Powerlink will be taking include:

- The Modern Slavery Working Group will review the risk assessments for all suppliers identified as being in the high-risk category and work with those suppliers to better understand their risks and put action plans in place where required
- Development of a process and guidance material for staff and decision makers relating to the management of high-risk and non-cooperative suppliers
- Refining the internal reporting on modern slavery initiatives
- Raising awareness across the business through discussions, appropriate training, and broad communications via the Working Group
- Collaborating with our energy industry peers to identify and address common challenges
- Supplier relationship management, to ensure open and constructive communication, as well as identifying early warning signs of potential modern slavery risks.

As an organisation, Powerlink recognises the seriousness of identifying modern slavery risks across the globe and will continue to manage those risks within our sphere of influence, and within our own business and supply chains.